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# OFFICIAL FILE STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION 19 1/ 10 LM '02

Citizens Telecommunications Company of Illinois and Grafton Technologies, Inc.	)	OHIEF CLERK'S OFFICE.  Docket No. 02-()2/4
Joint Petition for Approval of Negotiated Amendment to Interconnection Agreement pursuant to 47 U.S.C. § 252.	)	DOCKET NO. 02- OZI
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## JOINT PETITION FOR APPROVAL OF NEGOTIATED AMENDMENT TO AGREEMENT BETWEEN

## CITIZENS TELECOMMUNICATIONS COMPANY OF ILLINOIS AND GRAFTON TECHNOLOGIES, INC.

Citizens Telecommunications Company of Illinois ("Citizens") and Grafton Technologies, Inc. ("Grafton") hereby request that the Illinois Commerce Commission (the "Commission") review and approve the attached Amendment to Agreement Between Citizens Communications Company of Illinois and Grafton Technologies, Inc. (the "Amendment"), pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996, 47 U.S.C. § 252(a)(1) through 252(e) (the "Act"). In support thereof, the parties state as follows:

- 1. On January 25, 2001, in docket 01-0771, the Illinois Commerce Commission issued an Order approving a Negotiated Interconnection Agreement between Citizens and Grafton.
- 2. The Amendment to that Negotiated Interconnection Agreement attached hereto was arrived at through good faith negotiations between the parties as contemplated by § 252(a) of the Act.
- 3. Pursuant to § 252(e)(2) of the Act, the Commission may only reject a negotiated agreement or amendment if it finds that (1) the Agreement discriminates against another carrier,

or (2) implementation of the Agreement would not be consistent with the public interest, convenience, and necessity. Neither basis for rejection is present here.

As set forth in the attached Statement in Support, the implementation of the 4.

Amendment is consistent with the public interest and Citizens will make the Agreement

available to any other telecommunications carrier operating within its territory. Other carriers

are also free to negotiate their own terms and conditions pursuant to the applicable provisions of

the Act. For this reason, the Amendment is not discriminatory.

5. In accordance with § 252(e)(4) of the Act, the Agreement will be deemed

approved if the Commission does not act to approve or reject the Agreement within 90 days from

the date of this submission.

6. Copies of the Amendment are available for public inspection in Citizens' and

Grafton's public offices.

WHEREFORE, Citizens Telecommunications Company of Illinois and Grafton

Technologies, Inc. respectfully request that the Commission approve the attached Local

Interconnection Agreement under § 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS

GRAFTON TECHNOLOGIES, INC

COMPANY OF ILLINOIS

By: his Twill

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#### **VERIFICATION**

I, David Ruhland, do on oath depose and state that I am a Regulatory Manager for Citizens Telecommunications Company of Illinois, that I have read the foregoing Petition and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.

David	Ruh	land	

SIGNED AND SWORN TO BEFORE ME THIS \_\_\_\_\_ DAY OF

( ) ave Rulland

NOTARY PUBLIC



### **VERIFICATION**

I, Mike Amold [name], do on oath depose and state that I am
Vice President [title] for Grafton Technologies Incthat I have read the foregoing
Petition and that I know the contents thereof, an that the same is true and correct to the
best of my knowledge, information and belief.
Mik Amoko [Name]
SIGNED AND SWORN TO BEFORE ME THIS DAY OF
March , 2002.
NOTARY PUBLIC